

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:)	
)	Case No. 23-40934-659
ALYSSA N JANVRIN AKA)	Chapter 7
ALYSSA N TERRY)	
)	
Debtor,)	
)	
PENNYMAC LOAN SERVICES, LLC)	
)	
Movant,)	
)	TRUSTEE’S LIMITED OBJECTION
v.)	TO MOTION FOR RELIEF FROM STAY
)	
ALYSSA N JANVRIN AKA)	
ALYSSA N TERRY)	
)	Hearing Date: July 17, 2023
Respondent,)	Hearing Time: 10:00am
)	Objection Deadline: July 10, 2023

TRUSTEE’S LIMITED OBJECTION TO MOTION FOR RELIEF FROM STAY

COMES NOW David A. Sosne, Trustee, and for his Limited Objection to the Motion for Relief from Stay filed by PennyMac Loan Services, LLC, states to the Court as follows:

1. David A. Sosne (“Trustee”) is the duly appointed and acting Chapter 7 Trustee in the bankruptcy for the estate of Alyssa N. Janvrin (“Debtor”)
2. On or about March 20, 2023, Debtor filed her Voluntary Petition for Relief pursuant to Chapter 7 of the United States Bankruptcy Code, which is presently pending in this judicial district as Case No. 23-40934-659.
3. PennyMac Loan Services, LLC (“Movant”) filed its Motion for Relief from Automatic Stay (the “Motion”) on June 13, 2023. The Motion seeks relief from stay to foreclose on real estate located at 900 S. Second St., De Soto, MO 63020 (the “Property”) and asserts that the Movant is not adequately protected.

4. Trustee's preliminary estimates place the value at \$88,300.00 to \$161,000.00. Accordingly, there may be equity in the Property.

5. The Trustee has not conducted the 341 meeting of the creditors, which is scheduled for July 18, 2023, the day after the hearing is set for the Motion. Therefore, Trustee has not had and will not have the opportunity to complete his due diligence prior to the objection deadline or hearing.

6. In light of the foregoing, Trustee believes that granting relief from the automatic stay in this case would be premature at best and, based on preliminary estimates, inappropriate due to the potential equity in the Property. Trustee submits that a sale of the Property by the estate may generate sufficient funds to pay the Movant in full and provide a distribution to unsecured creditors.

7. In the event the Trustee discovers the bankruptcy estate has no interest in the Property due to a lack of equity prior to the hearing date on this Motion, he shall withdraw this Objection. Similarly, Trustee reserves the right to supplement this objection as he conducts further due diligence.

WHEREFORE, the Trustee prays that this Honorable Court deny the Motion, without prejudice, and allow the Trustee to conduct the 341 meeting of the creditors, complete his investigation of the Property, to perform his due diligence, and potentially to sell the Property for the benefit of creditors, and grant such further relief as may be just and proper.

Respectfully Submitted,
SUMMERS COMPTON WELLS LLC

Date: July 6, 2023

By: /s/ Brian J. LaFlamme
Brian J. LaFlamme, #49776MO
Attorney for Trustee
903 S. Lindbergh Blvd., Ste. 200
St. Louis, Missouri 63131
(314)991-4999/(314)991-2413/FAX
trusteeatty@summerscomptonwells.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on July 6, 2023 with the United States Bankruptcy Court for the Eastern District of Missouri and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List. I further certify that a true and correct copy of the foregoing document has also been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed below on July 6, 2023:

Alyssa N Janvrin
Debtor
900 S. Second St.
De Soto, MO 63020

William G. Ridings, Jr.
Attorney for Debtor
Ridings Law Firm
2510 S. Brentwood Blvd., Ste. 205
St. Louis, MO 63144

Melinda J. Maune
Amy Tucker Ryan
Attorneys for Movant
Armstrong Teasdale, LLP
7700 Forsyth Blvd., Ste. 1800
St. Louis, MO 63105

PennyMac Loan Services, LLC
Movant
120 S. Central Ave.
Clayton, MO 63105

Date: July 6, 2023

/s/ Christina Hauck